

REMARKS

SUMMARY:

The present application sets forth claims 11-13, 15, 17, 19-25, 56-57 and 59-66, of which claims 11 and 60 are independent claims. Claims 11-13, 15, 17, 19-25, 56-57 and 59-66 stand rejected as being allegedly directed to non-statutory subject matter under 35 U.S.C. § 101. Claims 11-13, 15, 17, 19-25, 56-57 and 59-66 stand rejected under 35 U.S.C. 112, second paragraph, a being allegedly indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 11-13, 15, 17, 19-25, 56-57 and 59-66 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Marybeth Regan, "Utilizing the Internet in education", College and University, Washington: Spring 2001 Vol. 76, Iss. 4; pgs. 37-45 (hereinafter "Regan") in view of U.S. Patent No. 7,062,462 (Ireland et al.) and further in view of U.S. Patent No. 5,870,721 (Norris) and further in view of Applicant's Admitted Prior Art (AAPA). Based on the following remarks, Applicant respectfully traverses each of the above rejections and requests reconsideration and allowance of all pending claims.

35 U.S.C. §103(a) REJECTION (CLAIMS 11-13, 15, 17, 19-25, 56-57 AND 59-66):

Claims 11-13, 15, 17, 19-25, 56-57 and 59-66 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Marybeth Regan, "Utilizing the Internet in education", College and University, Washington: Spring 2001 Vol. 76, Iss. 4; pgs. 37-45 (hereinafter "Regan") in view of U.S. Patent No. 7,062,462 (Ireland et al.) and further in view of U.S. Patent No. 5,870,721 (Norris) and further in view of Applicant's Admitted Prior Art (AAPA).

Applicant asserts that Regan is not prior art under 35 U.S.C. § 102(a) or any other section of 35 U.S.C. § 102. Regan has a publication date of "Spring 2001."

Applicant's date of invention was prior to January 3, 2001. In support of Applicant's prior date of invention, Applicant has concurrently filed a Declaration and associated exhibits submitted in accordance with 37 C.F.R. § 1.131, and establishing a date of invention that is prior to the publication date of the Regan reference. More particularly, the enclosed Declaration and exhibits establish prior conception, diligence and actual reduction to practice on the part of the inventor prior to the publication date of Regan. As such, Regan does not qualify as prior art under any section of 35 U.S.C. 102. Given that all of the Examiner's prior art rejections rely on Regan, Applicant respectfully submit that all of the rejections should be withdrawn.

35 U.S.C. § 101 REJECTION (CLAIMS 11-13, 15, 17, 19-25, 56-57 AND 59-66):

Claims 11-13, 15, 17, 19-25, 56-57 and 59-66 are apparently rejected under 35 U.S.C. § 101 as being directed to nonstatutory subject matter for two reasons. First, numbered pages 7-9 of the January 22, 2009 Office Action points to *In re Comiskey*, 84 USPQ2d 1670 (Fed. Cir. 2007), while indicating that the "[p]atent statute does not allow patents do be issued on particular business systems and methods that depend for their operation on human intelligence alone." Second, numbered page 9 indicates that independent claims 11 and 60 lack patentable utility for allegedly failing to provide a useful, tangible and concrete result.

Applicant respectfully submits that neither of the tests referenced in the recent Office Action are appropriate for evaluating patentable subject matter under 35 U.S.C. § 101. In particular, the *In re Comiskey* decision originally provided at 499 F.3d 1365, 84 U.S.P.Q.2d 1670 (Fed. Cir. 2007) has been vacated and the original opinion was withdrawn. The subject claims should also not be rejected for failing to provide a useful, concrete and tangible result because the Federal Circuit recently concluded in *In re Bilski*, 545 F.3d 943 (Fed. Cir. 2008) (en banc) that the "useful, concrete and tangible result" inquiry is inadequate. Instead, only the "machine-or-transformation test" is

appropriate to apply, and this test is applied only for analyzing the patentability of process claims under 35 U.S.C. § 101. As a result, case law and patentability analysis relying solely on a "useful, concrete and tangible result" analysis are no longer appropriate. *Id.*

It is not clear whether claims 11-13, 15, 17, 19-25, 56-57 and 59-66 are being rejected under § 101 based on the requirements set forth in *In re Bilski*. The substance of the § 101 analysis in the final rejection of the subject claims does not clearly invoke the "machine-or-transformation test" set forth in *In re Bilski*. (See January 22, 2009 Office Action, pages 7-9). However, the "Response to Arguments" section of the Office Action mentions *In re Bilski* relative to process claim analysis. (See January 22, 2009 Office Action, page 2.) Despite the lack of clarity in the January 22, 2009 Office Action, the claims at issue are addressed below in light of *In re Bilski*.

In re Bilski should not apply to claims 11-13, 14, 17, 19-25, 56-57 and 59-66 because such claims are not process claims. The "machine-or-transformation" standard set forth in *In re Bilski* applies only to processes. Independent claims 11 and 60 are directed to tangible web-based applications for providing a multi-level financial aid system featuring integrated and automated on-line financial aid features specific to a given educational institution to a user. Because such claims are directed to a tangible system and not a method, such claims are directed to patentable subject matter under § 101. Because claims 11 and 60 are not process claims, they are not required to satisfy the "machine-or-transformation" test set forth in *In re Bilski*.

The only requirement under 35 U.S.C. § 101 appropriate to claims 11-13, 15, 17, 19-25, 56-57 and 59-66 is that the claims be directed to one of the four categories of patentable subject matter defined in the statute. To be patentable under 35 U.S.C. § 101, claims must be directed to one of the four statutorily defined categories of patentable subject matter – process, machine, manufacture or composition of matter. Because claims 11-13, 15, 17, 19-25, 56-57 and 59-66 are directed to a software-based

“manufacture,” they clearly satisfy one of the four categories of patentable subject matter defined under 35 U.S.C. § 101.

Independent claims 11 and 60 are directed to tangible software-based system components, and are thus statutory under 35 U.S.C. § 101 as a product claim. In particular, claims 11 and 60 are directed to web-based applications for providing a multi-level financial aid system featuring integrated and automated on-line financial aid features specific to a given educational institution to a user. Such product claims include a variety of services selectively including an information collection service, a financial aid estimation service, a federal link service, a service for comparing information, a service for determining an authorized amount of financial aid, a service for providing an award notice, and a reporting service for generating reports. Such services are “web-based” and implemented in an “automated on-line” environment, thus explicitly requiring the use of computer-implemented software.

Courts have specifically concluded that computer useable medium and software claims are directed to statutory subject matter. See, e.g., *In re Lowry*, 32 F.3d 1579, 1582 (Fed. Cir. 1994); see also MPEP §§ 2106 and 2106.01. The web-based applications of claims 11 and 60 include tangible services that are embodied in a unique system of software and processing (see paragraph [0045] of the published application), which involves sophisticated algorithms, rules engines and software available in a processing center (e.g., SFAPC 12) – see paragraph [0046] of the published application. Because software applications are understood to be stored in a computer-readable medium and implemented by a computer processor, claims 11 and 60 are tangible manufactures and directed to patentable subject matter under 35 U.S.C. § 101.

Since claims 11 and 60 are software-based product claims, they are directed to tangible manufactures. In particular, an automated on-line web-based application that is implemented with software features is a tangible manufacture, thus falling into one of the four statutorily defined categories of patentable subject matter under 35 U.S.C. §

101. As such, both independent claims 11 and 60 satisfy the requirements of 35 U.S.C. § 101, and Applicant respectfully requests acknowledgement of the same.

35 U.S.C. § 112, SECOND PARAGRAPH REJECTION (CLAIMS 11-13, 15, 17, 19-25, 56-57 AND 59-66):

Claims 11-13, 15, 17, 19-25, 56-57 and 59-66 stand rejected under 35 U.S.C. 112, second paragraph, a being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. More particularly, numbered page 5 of the June 12, 2008 Office Action alleges the following:

“Claim 11 and 60, beside being a descriptive material (computer per se), have missing steps for example ‘a service for comparing,’ where is the result of such comparing and where is the result used? Similarly for other services with intended use “for” clauses, where the claims do not positively indicate the next step which uses the result of the service (do not claim any functionality which uses the information). The claimed language has missing step which create gap in the process of the invention for concrete and tangible result [sic].”

The Examiner's argument above is unclear in the sense that it discusses whether the invention has a concrete and tangible result, which relates more to patentability under 35 U.S.C. § 101 as opposed to 35 U.S.C. § 112. To the extent that the above language is intended to be concerned with patentable utility issues under 35 U.S.C. § 101, Applicant refers to and incorporates by reference the arguments already set forth above outlining how claims 11 and 60 are clearly directed to patentable subject matter. The remainder of the remarks in this section address issues under 35 U.S.C. § 112, second paragraph, and explain the particular reasons Applicant traverses this rejection.

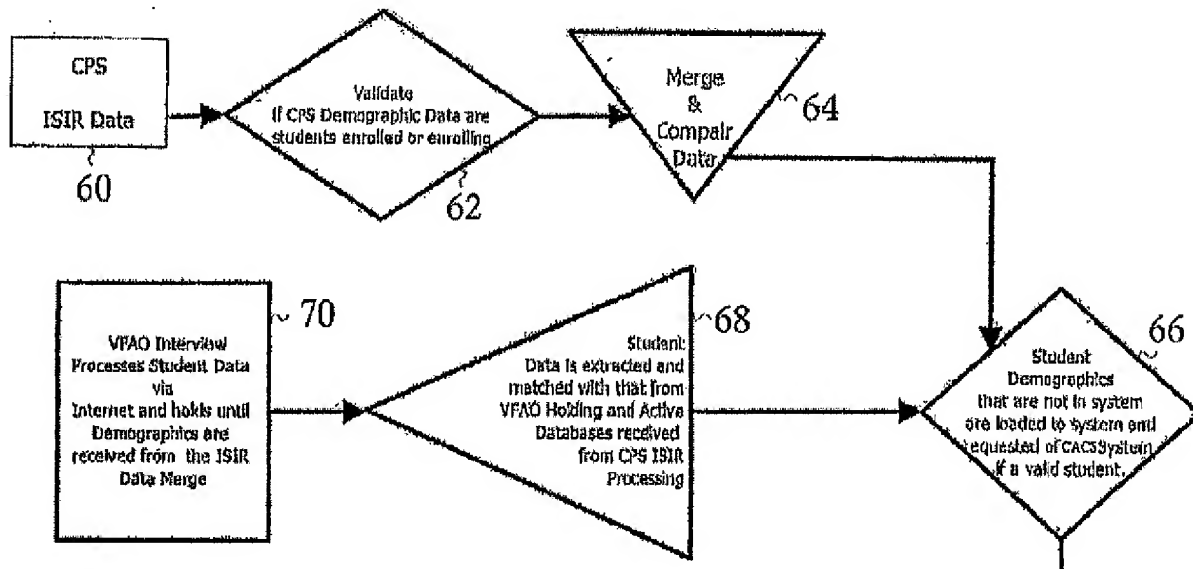
The specific portion of the second paragraph of 35 U.S.C. § 112 apparently relied on by the Examiner corresponds to the requirement that “the claim(s) particularly point out and distinctly claim the invention.” According to MPEP §§ 2106 and 2171, “[a]n

application fails to comply with ... [this] requirement when the claims do not set out and define the invention with a reasonable degree of precision and particularity. In this regard, the definiteness of the language must be analyzed, not in a vacuum, but always in light of the teachings of the disclosure as it would be interpreted by one of ordinary skill in the art.”.

Based on the language explicitly provided in claim 11, and described in relevant part in the specification, one of ordinary skill in the art would clearly understand the interaction among the given system processing services set forth in such claim. For example, the financial aid estimation service of claim 11 is particularly described as evaluating the information obtained via the first information collection service to generate a predicated amount of monetary aid for a student. By reading the specification, one of skill in the art would understand that the financial aid estimation service is embodied in a unique system of software and processing (see paragraph [0045] of the published application), which involves sophisticated algorithms, rules engines and software available in a processing center (e.g., SFAPC 12) – see paragraph [0046] of the published application. Thus, software that automatically implements the financial aid estimation service, takes input from the first information collection service, processes that data according to algorithmic rules also stored in software, and generates an estimation of available financial aid specific to a student and the given educational institution he/she is attending or planning to attend.

The “service for comparing” feature of claim 11 clearly indicates that the compared information corresponds to the “information obtained via said first information collection service and the given student’s ISIR document [obtained via the federal link service].” When viewing this service, not in a vacuum but in light of the specification, exemplary aspects of such a comparison are revealed. For example, Figure 5 (a relevant portion of which is shown below) shows how automated processing effected via

the comparing service of claim 11 merges and compares the student information and related ISIR data.



Part of Figure 5 of the Subject Application (USSN
10/054,689 (Weber))

As more particularly described in paragraph [0068] of the specification, VFAO system 10 preferably receives student interview data via the Internet at step 70, and then sends that data to either a holding database or an active database until additional demographic information is received. This additional information is typically in the form of an ISIR, and when received, all information is merged. In step 68, any data that is received from CPS ISIR processing is then matched with data extracted from active and holding databases in the VFAO application. CPS and ISIR data 60 is then validated in step 62 depending on whether a student is enrolled or is enrolling at that educational institution. Step 64 merges and ensures correct comparison of this validated ISIR information with a student's interview information, and student information is then stored in an active status database.

The above-described “service for comparing” leads right into the subsequently described “service for determining an authorized amount of financial aid” because official authorized financial aid determinations must inherently depend on the accuracy of student information, which is compared (i.e., for validation purposes) in the prior “service for comparing.” As particularly described in paragraph [0041] of the original specification, “once all required information for a student’s file is received, the student financial aid processing center begins an extensive and particular process of reviewing a student’s file. Preliminary review establishes verification of required documents, and quality control assures that established criteria are met for each reviewed student. Once a file is completely reviewed, loans and other aid can then be certified. As such, there is a clear correlation between the service for comparing information and the subsequently recited service for determining authorized (e.g., certified) amounts of aid. The final service set forth in claim 11 – “a service for providing an award notice to the given student” – particularly describes that such award notice is based on the previous determination of authorized financial aid eligibility, thus correlating this last step to the previous.

The language itself in claim 11 provides enough information for one of ordinary skill in the art to understand the particulars of the claimed invention. When further viewed, as required by law, in light of the specification (as opposed to in a vacuum), one of ordinary skill in the art would understand not only the particulars of the claimed invention, but how such services may particularly be implemented, for example, with the processing steps illustrated in and described with reference to Figs. 4 – 7, respectively. For this reason, Applicant requests withdrawal of the pending rejection of claim 11 under 35 U.S.C. § 112, second paragraph. The arguments above can be similarly applied to independent claim 60. As such, claim 60 also particularly points out and distinctly claims the invention and thus satisfies all requirements of 35 U.S.C. § 112,

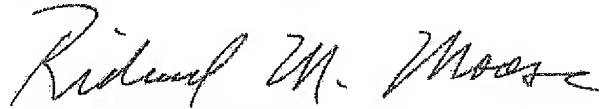
second paragraph. Claims 11-13, 15, 17, 19-25, 56-57 and 59-66 adequately point out and distinctly claim the subject matter which applicant regards as his invention.

CONCLUSION:

Inasmuch as all outstanding issues have been addressed, Applicant respectfully submits that the present application, including claims 11-13, 15, 17, 19-25, 56-57 and 59-66, is in complete condition for issuance of a formal Notice of Allowance, and action to such effect is earnestly solicited. Applicant invites the Examiner to telephone the undersigned at his convenience should only minor issues remain after consideration of this response in order to permit early resolution of the same.

Respectfully submitted,

DORITY & MANNING,
ATTORNEYS AT LAW, P.A.

A handwritten signature in dark ink, appearing to read "Richard M. Moose", is written over a horizontal line.

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Internet Transmission Date:

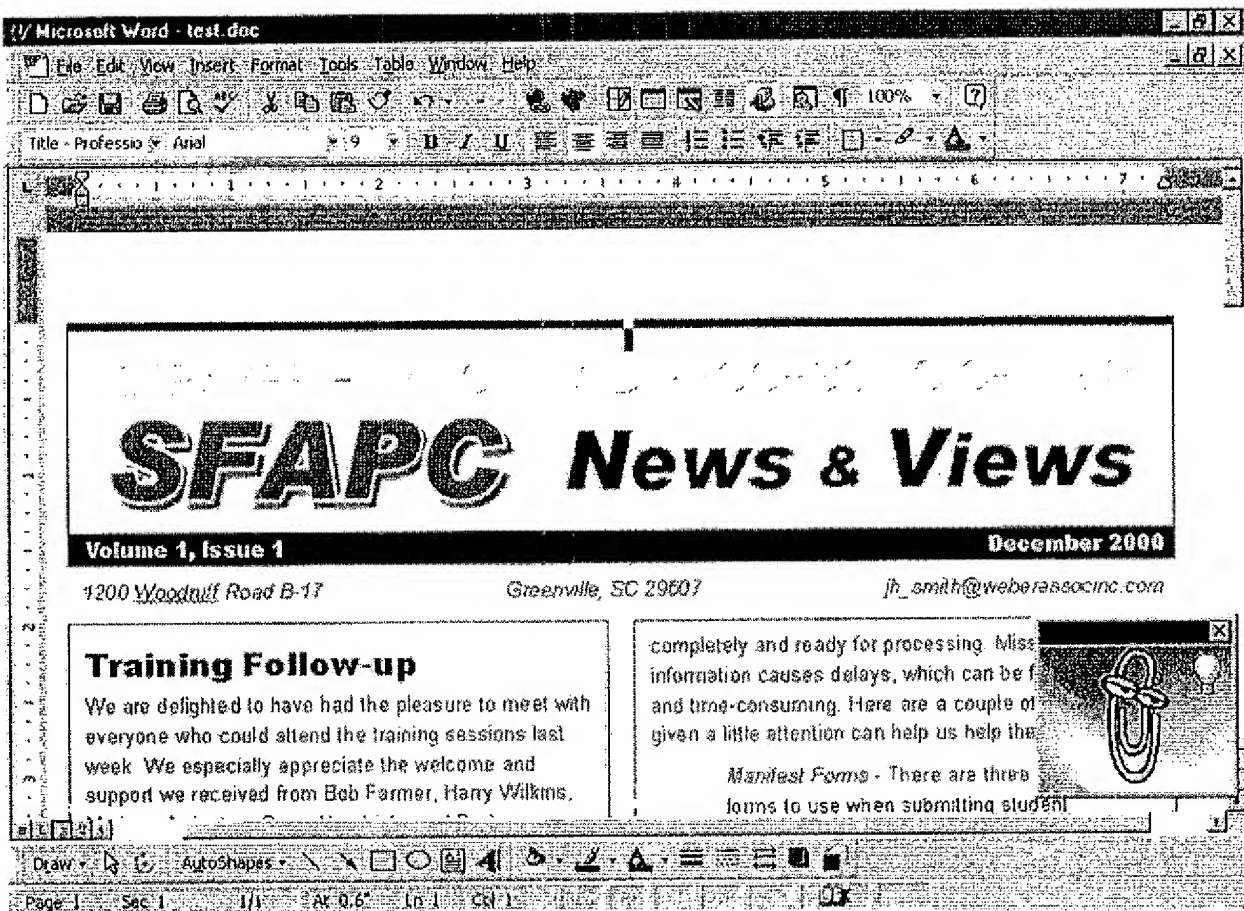
2001/01/03

Serial Number:

78041496

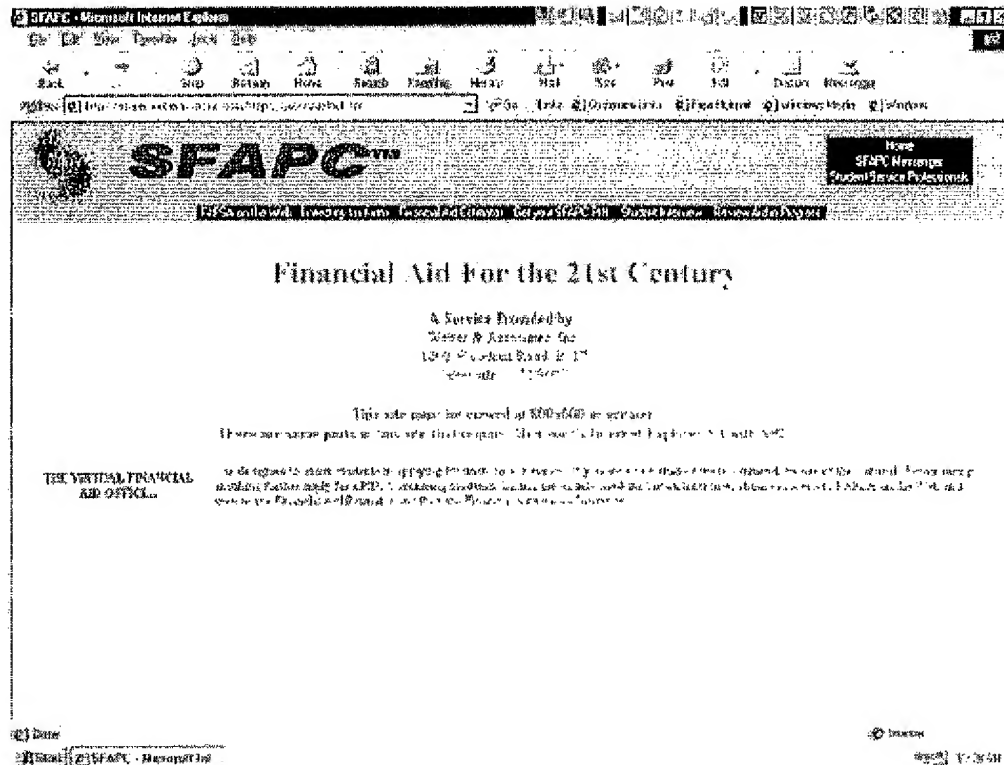
Filing Date:

2001/01/03



The applicant has submitted required color specimen.
The USPTO has printed only one copy of the specimen,
and extra copies can be produced in-house as needed.

The **SFAPC™** Web Site: (Opening Page)



The **SFAPC™** Site is "The Virtual Financial Aid Office" of the future.

This site is used for both students and College Financial Aid Professionals to apply, process, and track Title IV Funding for the customers of Weber & Associates, Inc., located in Greenville, SC.

For the Student:

The site enables the student to have at the click of a computer mouse a link the US Department of Education's FAFSA on the Web, where all Federal Title IV funding begins.

The student can find a link to the United States Internal Revenue Service for the gathering of their tax information.

The Student has a Financial Aid Estimator based on the current cost of the institution the site was built for.

For the Student:

This site provides a secure method of collecting private data from the student to be used in conjunction with the issued PIN as an 'Electronic Signature' used by the **SFAPC™** as the student moves through the Financial Aid Application process.

SFAPC™ Interview Logon:
(Student logs on to the **SFAPC™** Interview Site to
obtain access to the interview)

(Student logs on to the **SFAPC™** Interview Site to
obtain access to the interview)

The screenshot shows a web browser window titled "SFAPC - Microsoft Internet Explorer". The address bar displays "http://www.sfapc.com/". The page content includes the SFAPC logo, a navigation bar with links like "Home", "SFAPC Interview", "Student Service Reference", "FAQs", "Contact Us", "Privacy Policy", "Terms of Use", "Site Map", "Feedback", "Help", "About Us", "SFAPC Interview", "Student Service Reference", "FAQs", "Contact Us", "Privacy Policy", "Terms of Use", "Site Map", "Feedback", "Help", "About Us". Below the navigation bar, there is a section titled "SFAPC™" with a sub-header "Welcome to the SFAPC™ Interview Logon Page". The main content area contains a logon form with the following fields and instructions:

SFAPC™
Welcome to the SFAPC™ Interview Logon Page. The SFAPC™ Interview Logon Page is the first step in the SFAPC™ Interview Process. To access the SFAPC™ Interview, you must first log on to the SFAPC™ Interview Logon Page. The SFAPC™ Interview Logon Page is the first step in the SFAPC™ Interview Process. To access the SFAPC™ Interview, you must first log on to the SFAPC™ Interview Logon Page.

Instructions: (Please read the instructions carefully before logging on to the SFAPC™ Interview.)

- 1. Enter your SSN (Social Security Number) in the space provided. Do not enter your SSN with a hyphen (-) or a space.
- 2. Enter your PIN (Personal Identification Number) in the space provided. Do not enter your PIN with a hyphen (-) or a space.
- 3. Click the "Submit" button.

Below the instructions, there are two input fields labeled "SSN" and "PIN", followed by a "Submit" button. The browser status bar at the bottom shows "http://www.sfapc.com/".

For the Student:

When the student completes the **SFAPC™** PIN Application process they are issued a PIN that can be used immediately.

The student will use their SSN in conjunction with their PIN to gain access to the Student Interview Process.

The PIN is used through out the Interview Process to affirm the statement that are presented to the student and to acknowledge that the student is in full understanding of the process, the amounts they are applying, etc...

SFAPC™ Messenger Service: (Message service within the **SFAPC™)**

SFAPC™ Messenger

1. Use the SFAPC Messenger Service to send an electronic message to the college's Title IV compliance specialist.
2. Your message will be sent immediately to the college.
3. Your message will be routed to the appropriate representative to get your answer.
4. When sending a message, please do not use placeholder text (names, addresses, etc.) as the system will not be able to process your message.

Your Site Security ID# _____

Name (Last, First) _____

Address _____

City, State, Zip _____

Telephone _____

Please Respond via _____

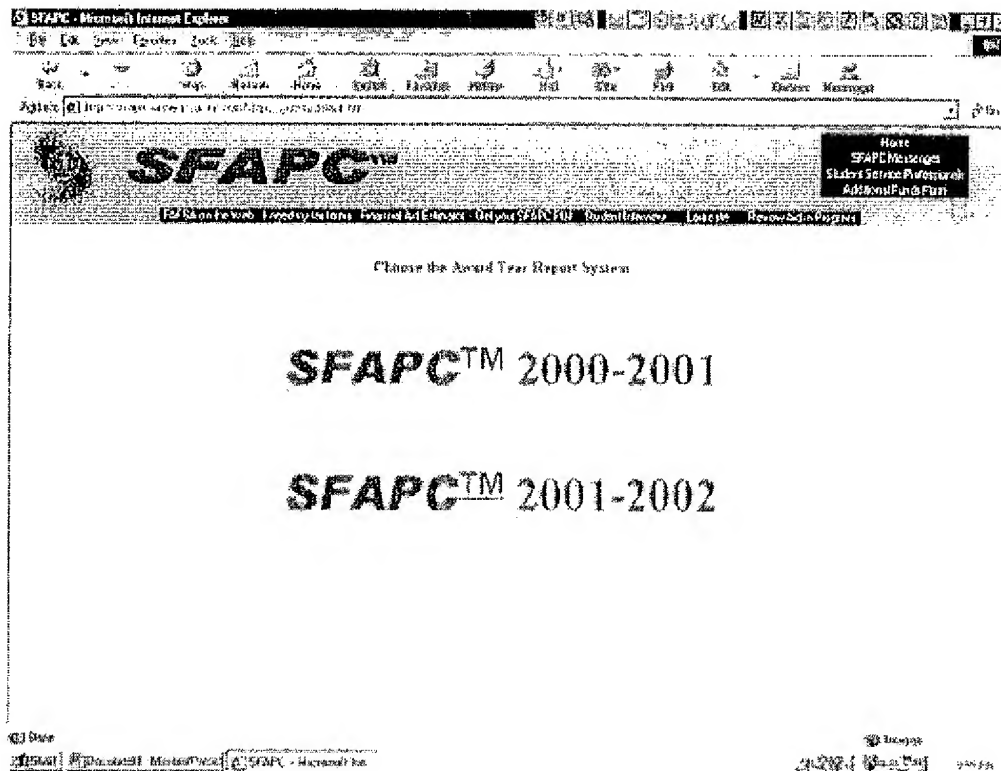
☐ I am a student

For the Student and the College Professional.

While it is geared toward the student, this site can be used by the College Professional to send an electronic message to the Processing Center in the form of an email, which will be responded to within the next business day or before.

The **SFAPC™** Messenger requests the method (email or telephone) that the sender wants to be responded by the Processing Center.

The message is asked 'free form' and is emailed to a Title IV compliance specialist at the Processing Center.

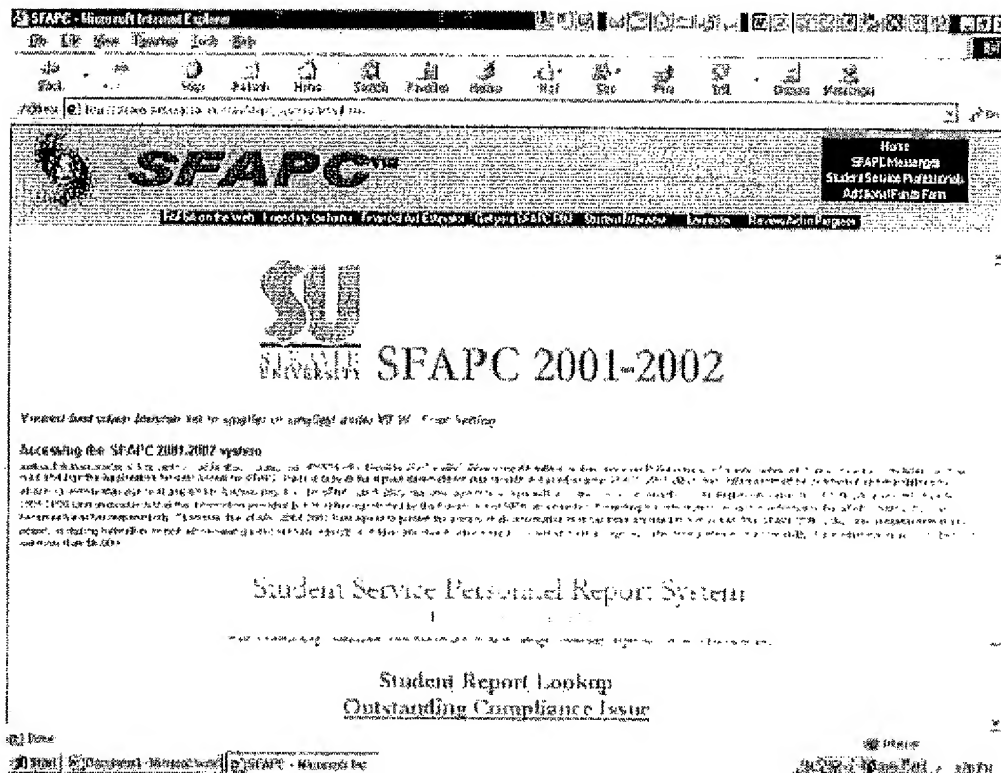
SFAPC™ for Professional Staff: (SFAPC™ Report Generator)**For the College Professional: (Student Service Professional)**

Users of the **SFAPC™** Student Service Professionals must have approval from the SFAPC Management and the College Management.

Each user has applied, signed Privacy Statements and been assigned User Names and Passwords to gain entry to the site.

Because Title IV Funding is year specific so is the **SFAPC™**.

SFAPC™ Reporting System: (Individual Report Title Descriptions Point and Click)



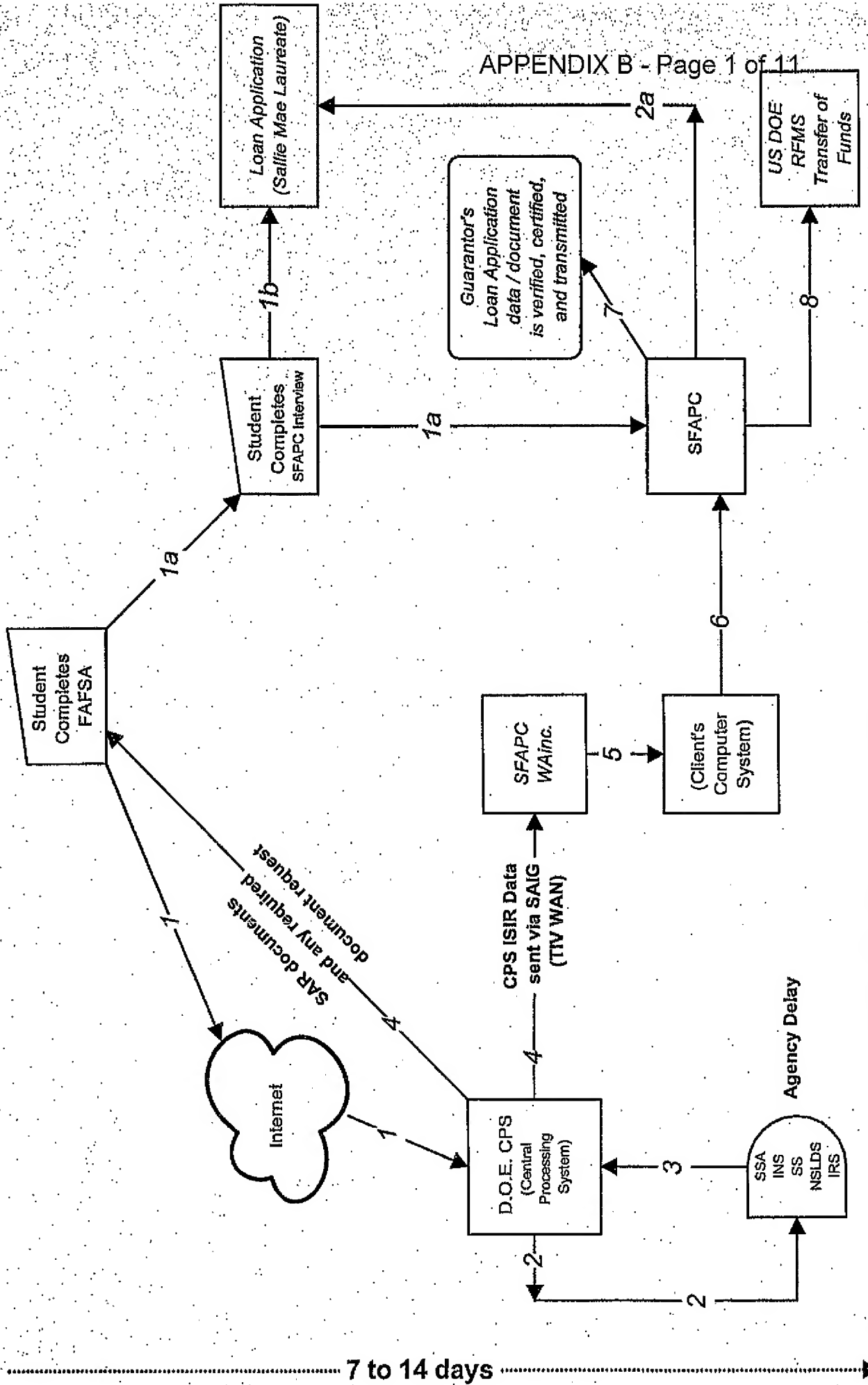
For the College Professional: (Student Service Professional)

Each report has it's specific use, whether it's individual 'Student Report Lookup' or 'Outstanding Compliance Issues' by campus or universal.

These tools are management reports to pin point the individual or universal advancement of the Title IV process at the College.

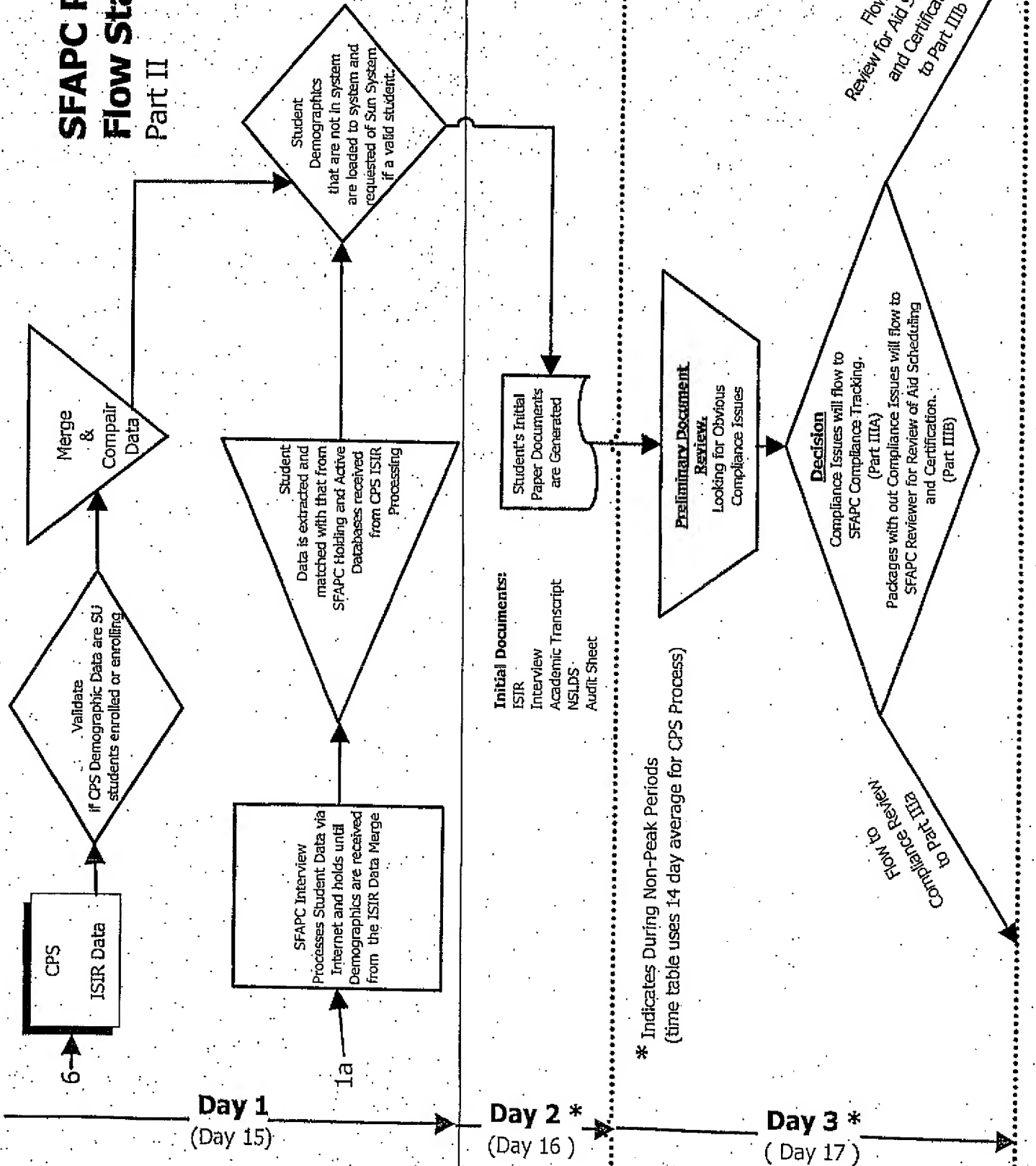
SFAPC Processing Flow Stages

CPS Processing and Part I (Online Interview)



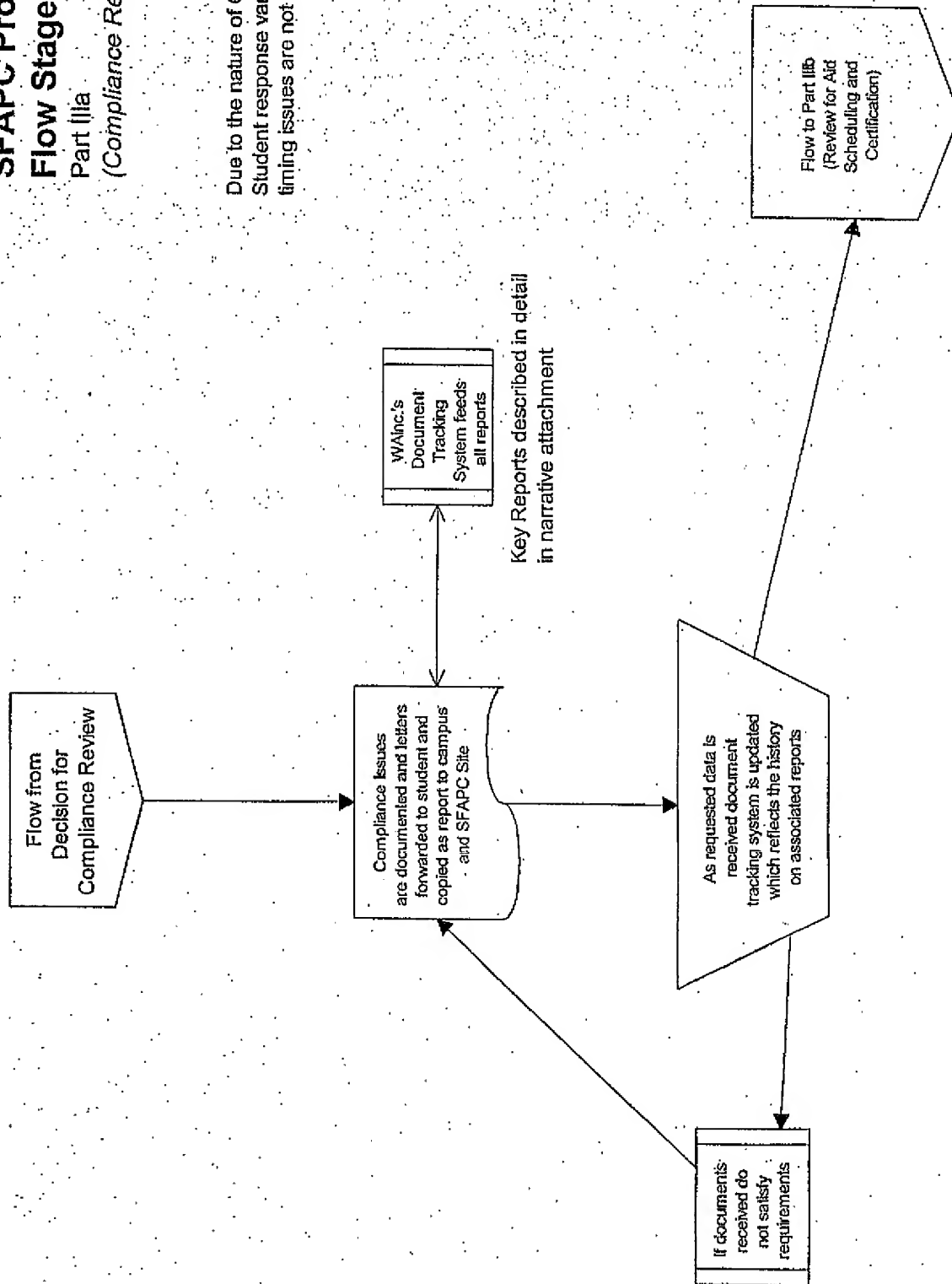
SFAPC Processing Flow Stages

Part II



SFAPC Processing Flow Stages Part IIIa (Compliance Review)

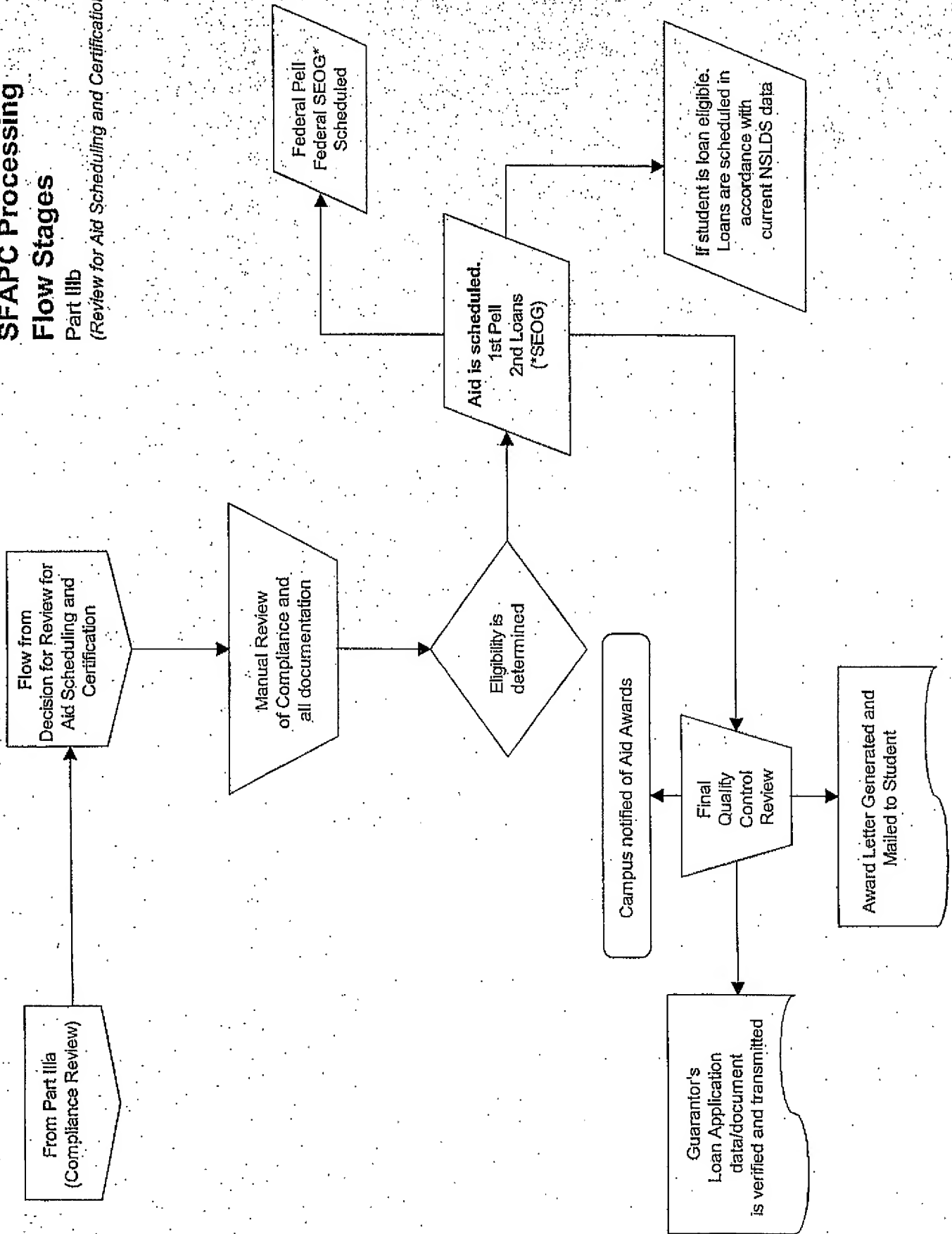
Due to the nature of Compliance
Student response varies, therefore
timing issues are not defined.



SFAPC Processing Flow Stages

Part IIIb

(Review for Aid Scheduling and Certification)



Day 4 to 8
(Day 18 to 22)

Common Acronyms and Terms Used in Federal Financial Aid

Acronym Term	Name/Meaning	Acronym Term	Name/Meaning
ACA	Administrative Cost Allowance	FPLUS	Federal Parent Loan for Undergraduate Student
AGI	Adjusted Gross Income	FSEOG	Federal Supplemental Educational Opportunity Grant
AIS	Auditor's Information Sheet	FSFAH	Federal Student Financial Aid Handbook
AY or A/Y	Award Year or Academic Year	FWS	Federal Work Study
BBAY	Borrower-Based Award Year	GAPS	Grants Administration and Payment System
BBS	Bulletin Board System	GPA	Grade Point Average
C-Flag	Compliance Issue Noted on ISIR at end of EFC	HEA	Higher Education Act of 1965, as amended
CFR	Code of Federal Regulations	IFAP	Information for Financial Aid Professionals
CGPA	Cumulative Grade Point Average	INS	Immigration and Naturalization Service
CMO	Case Management & Oversight	IRS	Internal Revenue Service
COA	Cost of Attendance	ISIR	Institutional Student Information Record
COE	Cost of Education	LDA	Last Day of Attendance
CWS	College Work Study	NCS	National Computer Systems
DOD	Department of Defense	NSLDS	National Student Loan Data System
DOE	Department of Education	OIG	Office of Inspector General
DRN	Document Release Number	OMB	Office of Management and Budget
ECFMG	Education Commission for Foreign Medical Graduates	OPE	Office of Postsecondary Education
EDE	Electronic Data Entry	Pell	Federal Pell Grant
EFC	Expected Family Contribution	PLUS	Federal Direct / FFEL Parent Loan
EPV	Electronic Payment Voucher	RFMS	Recipient Financial Management System
ESAR	Electronic Student Aid Report	SS	Selective Service
FAA	Financial Aid Administrator	SAIG	Student Aid Internet Gateway
FAFSA	Free Application for Federal Student Aid	SAP	Standard of Academic Progress
FAT	Financial Aid Transcript	SAR	Student Aid Report
FDLP	Federal Direct Loan Program	SEOG	Federal Supplemental Education Opportunity Grant
FDLS	Federal Direct Loan Subsidized	SFA	Student Financial Assistance
FDLU	Federal Direct Loan Unsubsidized	SSA	Social Security Administration
FFEL	Federal Family Education Loan	SSCR	Student Status Confirmation Report
FISAP	Fiscal Operations and Application to Participate	TIV WAN	Title IV Wide Area Network
		TIV WAN	Title IV Wide Area Network

SFAPC Flow Chart (Narrative)

Part I. CPS Processing and Online Interview.

1. Once a student decides they will need financial aid, they must complete a FAFSA. Once the FAFSA is completed, it is submitted electronically to the Department of Education's Central Processing System (CPS).
2. The D.O.E. CPS submits information to the Immigration and Naturalization Service (INS), Social Security Administration (SSA), Selective Service (SS), and the National Student Loan Data System (NSLDS) to verify information reported on the FAFSA. In the future, information will also be sent to the Internal Revenue Service.
3. The INS, SSA, SS, and NSLDS report their findings back to the D.O.E. CPS and the processing of the FAFSA is continued. This process takes seven to twenty-one days, depending on the volume of FAFSA applications the CPS has to process. (Flow Chart illustrates this as a 14 day average)
4. Once the FAFSA is processed, the student is sent via mail a Student Aid Report (SAR) and the SFAPC receives an electronic Institution Student Information Report (ISIR) via SAIG (TIV WAN). The SAR may request the student to provide the school with documents to verify information the INS, SSA, SS, and the NSLDS were not able to verify. Note: This information is requested by the SFAPC at a later date.
5. The ISIR information is immediately flowed through the Clinet's database to verify the students registration status.
6. The ISIR information is then forwarded to the SFAPC system.
- 1a. Once the FAFSA is submitted to CPS the student immediately receives an Estimated Family Contribution (EFC). The student uses their EFC to complete the Student Interview for Financial Aid on the SFAPC system. The student submits it electronically and the SFAPC holds the interview online until it receives the ISIR data via SAIG (TIV WAN) seven to twenty-one days later. (Flow Chart illustrates this as a 14 day average)
- 1b. The student must also complete a Master Promissory Note (MPN) with Sallie Mae on the Laureate web site or paper MPN if the lender is not a Laureate Lender.
- 1a. Once the ISIR, Interview, and Laureate MPN are complete, the package is reviewed for compliance and then processed after all compliance issues are resolved and the student is determined eligible for aid.
- 2a. Sallie Mae's Laureate web site is updated with student's current information and the loan is certified and transmitted.
8. The US Department of Education RFMS Transfers Funds for SEOG and Pell once funds are verified and requested at a later date.

Part II.

Day 1

- 1a. Student's Interview data is sent into the SFAPC Holding database and/or the Active database

6. Once the ISIR is received the CPS ISIR data is sent through the Client's database to validate that the student is enrolled or enrolling. This information is merged with the students interview information and the student is pulled into the Active database. The Students Demographics that are not already in the system are loaded to the Sun System and then requested from the Sun System.
-

Day 2

Item 1a and 6 from Part I.

- Once all the data is extracted and compared, the students initial paper documents are generated into a hard copy file. These papers include the ISIR, Student Interview, Academic Transcripts, NSLDS printout, and an Audit Sheet.
-

Day 3

Item 1a and 6 from Part I.

- All new files are reviewed for obvious compliance issues such as Verification, class registration and C-Flag issues. C-Flag issues involve Citizenship, Selective Service registration, loan defaults and bankruptcies, permanent disability, Social Security name conflicts, etc.
 - The files are separated at this point. Files with compliance issues flow to a compliance review. Files that are workable flow to the review stage for aid scheduling and certification. Workable files at this point are files that do not have obvious issues or have already resolved these issues. The more detailed review may show other issues such as loan period overlaps, academic credit issues, unsatisfactory academic progress, etc.
-

Part IIIa. Flow from decision for *compliance review*.

Day 4 – until students respond with needed documents.

Item 1a and 6 From Part I.

- Students with compliance issues are researched to verify if and what documents are needed.
 - The students' compliance issues are documented and the student is sent a letter requesting the needed information. The campus is e-mailed a report listing the student as having compliance issues.
 - The SFAPC system is updated by WAinc.'s tracking system so all reports show the new status of these students files.
 - As students respond, their files are reviewed to verify that sent documents satisfy their compliance issues. The tracking system is updated to reflect any change in the status of their compliance issues and all SFAPC reports are updated.
 - If the documents that were sent are not adequate the student is sent another letter asking for needed documents.
 - If the documents satisfy all compliance issues the student's file flows to the review for aid scheduling and certification.
-

Part IIIb. Flow from decision for review for *aid scheduling and certification*.

Day 4-8

Item 1a and 6 from Part I.

- A processor, who will verify the student's eligibility and that all documents are completed, reviews the files that are ready to be worked.
- The processor determines what aid the student is eligible for and schedules according to their eligibility and Financial Plan.
- Pell is scheduled first and the maximum eligibility for their attendance status is awarded. Any remaining need is compensated with loans.

Item 8 from Part I.

- SEOG is scheduled on a separate date. Eligibility for SEOG is determined off of the student's EFC and the availability of funds for their campus. This is a first come first serve aid type and not all Pell eligible students may receive this aid.

Item 1a and 6 from Part I.

- The File is sent for a final Quality Control. The Award is verified as well as compliance resolutions.
- The Quality Controller Sends the student an award notice and then the campus is sent a file complete report every Monday

Item 2a from Part I.

- The loan is then transmitted to the lender or Loan Service Center. (Ex. Sallie Mae)

Virtual Financial Aid Office (*VFAO) Flow Chart (Narrative)

Part I. CPS Processing and Online Interview.

1. Once a student decides they will need financial aid, they must complete a FAFSA. Once the FAFSA is completed, it is submitted electronically to the Department of Education's Central Processing System (CPS).
2. The D.O.E. CPS submits information to the Immigration and Naturalization Service (INS), Social Security Administration (SSA), Selective Service (SS), and the National Student Loan Data System (NSLDS) to verify information reported on the FAFSA. In the future, information will also be sent to the Internal Revenue Service.
3. The INS, SSA, SS, and NSLDS report their findings back to the D.O.E. CPS and the processing of the FAFSA is continued. This process takes seven to twenty-one days, depending on the volume of FAFSA applications the CPS has to process. (Flow Chart illustrates this as a 14 day average)
4. Once the FAFSA is processed, the student is sent via mail a Student Aid Report (SAR) and the *VFAO receives an electronic Institution Student Information Report (ISIR) via SAIG (TIV WAN). The SAR may request the student to provide the school with documents to verify information the INS, SSA, SS, and the NSLDS were not able to verify. Note: This information is requested by the *VFAO at a later date.
5. The ISIR information is immediately flowed through the Clinet's database to verify the students registration status.
6. The ISIR information is then forwarded to the *VFAO system.
- 1a. Once the FAFSA is submitted to CPS the student immediately receives an Estimated Family Contribution (EFC). The student uses their EFC to complete the Student Interview for Financial Aid on the *VFAO system. The student submits it electronically and the *VFAO holds the interview online until it receives the ISIR data via SAIG (TIV WAN) seven to twenty-one days later. (Flow Chart illustrates this as a 14 day average)
- 1b. The student must also complete a Master Promissory Note (MPN) with Sallie Mae on the Laureate web site or paper MPN if the lender is not a Laureate Lender.
- 1a. Once the ISIR, Interview, and Laureate MPN are complete, the package is reviewed for compliance and then processed after all compliance issues are resolved and the student is determined eligible for aid.
- 2a. Sallie Mae's Laureate web site is updated with student's current information and the loan is certified and transmitted.
8. The US Department of Education RFMS Transfers Funds for SBOG and Pell once funds are verified and requested at a later date.

Part II.

Day 1

- 1a. Student's Interview data is sent into the *VFAO Holding database and/or the Active database

6. Once the ISIR is received the CPS ISIR data is sent through the Client's database to validate that the student is enrolled or enrolling. This information is merged with the student's interview information and the student is pulled into the Active database. The Student Demographics that are not already in the system are loaded to the Sun System and then requested from the Sun System.
-

Day 2

Item 1a and 6 from Part I.

- Once all the data is extracted and compared, the student's initial paper documents are generated into a hard copy file. These papers include the ISIR, Student Interview, Academic Transcripts, NSLDS printout, and an Audit Sheet.
-

Day 3

Item 1a and 6 from Part I.

- All new files are reviewed for obvious compliance issues such as Verification, class registration and C-Flag issues. C-Flag issues involve Citizenship, Selective Service registration, loan defaults and bankruptcies, permanent disability, Social Security name conflicts, etc.
 - The files are separated at this point. Files with compliance issues flow to a compliance review. Files that are workable flow to the review stage for aid scheduling and certification. Workable files at this point are files that do not have obvious issues or have already resolved these issues. The more detailed review may show other issues such as loan period overlaps, academic credit issues, unsatisfactory academic progress, etc.
-

Part IIIa. Flow from decision for *compliance review*.

Day 4 – until students respond with needed documents.

Item 1a and 6 From Part I.

- Students with compliance issues are researched to verify if and what documents are needed.
 - The student's compliance issues are documented and the student is sent a letter requesting the needed information. The campus is e-mailed a report listing the student as having compliance issues.
 - The *VFAO system is updated by WAINC's tracking system so all reports show the new status of these student's files.
 - As students respond, their files are reviewed to verify that sent documents satisfy their compliance issues. The tracking system is updated to reflect any change in the status of their compliance issues and all *VFAO reports are updated.
 - If the documents that were sent are not adequate the student is sent another letter asking for needed documents.
 - If the documents satisfy all compliance issues the student's file flows to the review for aid scheduling and certification.
-

Part IIIb. Flow from decision for review for *aid scheduling and certification*.

Day 4-8

Item 1a and 6 from Part I.

- A processor, who will verify the student's eligibility and that all documents are completed, reviews the files that are ready to be worked.
- The processor determines what aid the student is eligible for and schedules according to their eligibility and Financial Plan.
- Pell is scheduled first and the maximum eligibility for their attendance status is awarded. Any remaining need is compensated with loans.

Item 8 from Part I.

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